

Rules Comments

From: Versowsky, Paul (PEVE) [PEVE@chevrontexaco.com]
Sent: Tuesday, May 28, 2002 5:17 PM
To: 'rules.comments@mms.gov'
Subject: Notice of Proposed Rulemaking - RIN 1010-AC85



Cover Ltr to MMS on
Subpart I....

Department of the Interior, Minerals Management Service; MS 4024
381 Elden Street
Herndon, Virginia 20170-4817

Attn: Rules Processing Team (RPT)

Re: Notice of Proposed Rulemaking; RIN 1010-AC-85
Rewrite of Subpart I, et. al., to include Floating Production
Systems

Gentlemen:

ChevronTexaco appreciates this opportunity to provide written comments on the subject proposed rule to amend regulations for offshore platform, as provided in the December 27, 2001 Federal Register Notice.

ChevronTexaco applauds the efforts of MMS to rewrite 30 CFR Subpart I---Platforms and Structures to a performance based regulation relying on industry recommended practices and standards in lieu of highly prescriptive regulations. We also recognize MMS for moving forward to adopt regulations for floating platforms. However, please note the following major concern.

There are significant differences between the two field development concepts covered by the proposed rewrite of Subpart I: the fixed production platform and the floating production platform. These differences include such things as number of deployments of each concept (a handful of floating production platforms versus thousands of shallow and deepwater fixed platforms); design, fabrication, and installation complexity; availability of design firms and CVA firms; and cost. ChevronTexaco suggests that forcing one Subpart to cover both concepts is extremely confusing, lacks focus on the unique characteristics of the individual concepts, and creates a document that is difficult to read. ChevronTexaco recommends two distinctly separate sections of CFR250, either within Subpart I, or preferably in a new Subpart covering floating production platforms. Ultimately, ChevronTexaco feels this will provide for a clearer document by removing the ambiguities created by attempting to use wording originally written for fixed platform in rules for floating platforms.

Please feel free to contact the undersigned at (504) 592-6245, if you have any questions concerning these comments or wish to discuss them in more detail. A companion Word file with this comment is attached.

Sincerely,

Paul E. Versowsky, Facilities Advisor - Structural

ChevronTexaco
Gulf of Mexico Shelf Strategic Business Unit
935 Gravier Street, Room 859, New Orleans, LA 70112
Tel 504 592 6245 Fax 504 592 6692

May 29, 2002

Department of the Interior, Minerals Management Service; MS 4024
381 Elden Street
Herndon, Virginia 20170-4817

Attn: Rules Processing Team (RPT)

Re: Notice of Proposed Rulemaking; RIN 1010-AC-85
Rewrite of Subpart I, et. al., to include Floating Production Systems

Gentlemen:

ChevronTexaco appreciates this opportunity to provide written comments on the subject proposed rule to amend regulations for offshore platforms, as provided in the December 27, 2001 Federal Register Notice.

ChevronTexaco applauds the efforts of MMS to rewrite 30 CFR Subpart I--Platforms and Structures to a performance based regulation relying on industry recommended practices and standards in lieu of highly prescriptive regulations. We also recognize MMS for moving forward to adopt regulations for floating platforms. However, please note the following major concern.

There are significant differences between the two field development concepts covered by the proposed rewrite of Subpart I: the fixed production platform and the floating production platform. These differences include such things as number of deployments of each concept (a handful of floating production platforms versus thousands of shallow and deepwater fixed platforms); design, fabrication, and installation complexity; availability of design firms and CVA firms; and cost. ChevronTexaco suggests that forcing one Subpart to cover both concepts is extremely confusing, lacks focus on the unique characteristics of the individual concepts, and creates a document that is difficult to read. ChevronTexaco recommends two distinctly separate sections of CFR250, either within Subpart I, or preferably in a new Subpart covering floating production platforms. Ultimately, ChevronTexaco feels this will provide for a clearer document by removing the ambiguities created by attempting to use wording originally written for fixed platform in rules for floating platforms.

Please feel free to contact the undersigned at (504) 592-6245, if you have any questions concerning these comments or wish to discuss them in more detail. A companion Word file with this comment is attached.

Sincerely,

Paul E. Versowsky, Facilities Advisor - Structural

ChevronTexaco

Gulf of Mexico Shelf Strategic Business Unit
935 Gravier Street, Room 859, New Orleans, LA 70112
Tel 504 592 6245 Fax 504 592 6692

<mailto:peve@chevrontexaco.com>